

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

IN RE: ETHICON  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO ALL CASES

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**APPLICATION FOR PLAINTIFFS' STEERING COMMITTEE**

**VICTORIA J. MANIATIS**

NOW INTO COURT, comes Victoria J. Maniatis, who respectfully files this Application for appointment as a member of the Ethicon Pelvic Repair Systems Products Liability Litigation Plaintiffs' Steering Committee and states the following:

After conferring her B.A. from Penn State in 1990 and J.D. from Hofstra Law School in 1993, Victoria ("Vicki") Maniatis was admitted to practice in the state and federal courts of New York and New Jersey. She began her legal career as an insurance defense attorney, managing her case load from case opening through bench and jury trial verdicts, excelling particularly with medical and damages-oriented work. Concluding plaintiffs' work was more suited to her skill set, she joined Kreindler & Kreindler in 1998 where she worked on Aviation MDL's including TWA 800, Swiss Air 111 and KAL 801 (Guam). Ms. Maniatis is particularly able to handle party disputes having the benefit of both plaintiffs and defense experience in her background. The ability to see both sides of the coin aides her not only in avoiding unnecessary disputes, but in dealing with disagreements effectively and congenially when they do arise. Ms. Maniatis has also frequently been commended for her professionalism in working with adversaries, clerks, court staff and the bench alike. Furthermore, Ms. Maniatis has already been working with attorneys in the Pelvic Mesh cases, many of whom she has worked well with in prior matters.

Since 2001, Ms. Maniatis focused her mass torts practice on pharmaceutical and medical devices. With her firm, Sanders Viener Grossman, LLP, Ms. Maniatis served as a trial team member under the leadership of Marc Grossman on the Rosenberg v. Merck, Fosamax trial conducted to verdict before the Honorable Carol E. Higbee in Atlantic County, New Jersey. Most recently, Ms. Maniatis was appointed to the Plaintiffs' Steering Committee for the Fosamax Femur MDL No. 2243 presided over by the Hon. Joel A. Pisano, in the United States District Court, District of New Jersey. Currently Ms. Maniatis is actively working on Pelvic Repair Systems cases in New Jersey state court, attending hearings, performing document review, and assisting with deposition preparation, as well as being a frequent lecturer on Pelvic Repair Systems litigation, damages and demographics.

Ms. Maniatis has worked with several Plaintiffs' Attorneys leadership groups performing PSC assignments and common benefit work in both State and Federal Courts in several major mass tort litigations, including, but not limited to; Avandia MDL Science Committee, Zimmer NexGen Knee Replacement MDL, Pelvic Mesh Coordinated Proceedings New Jersey Superior Court, Atlantic County, New Jersey, Yaz/Yasmin MDL Science Committee, Baycol MDL and Pennsylvania State Court Coordinated Proceeding; ReNu with MoistureLoc MDL and New York State Court Coordinated Proceeding; as well as the Accutane MDL and Accutane Mass Tort in New Jersey Superior Court, Atlantic County. The work in these litigations has included participation in developing discovery protocols, document review, discovery preparation, case specific and Common Benefit motion practice, bellwether criteria, case selection, work up and trial. Vicki was the Avandia PSC's lead drafter and negotiator of the Avandia fact sheet that was ultimately approved by The Hon. Cynthia M. Rufe in E.D.Pa, and adopted by The Hon. Sandra Mazer Moss, Philadelphia Court of Common Pleas litigation, Vicki was also assigned to the Avandia PSC Science Committee, working specifically on lipid and stroke issues, and preparing teams conducting corporate depositions. Ms. Maniatis also frequently lectures at pharmaceutical/medical device CLE and informational seminars, including AAJ, Mass Torts Made Perfect, HarrisMartin Publishing and HB; has published articles for the ABA and AAJ on pharmaceutical and vaccination matters, and served as the Editor of the AAJ Avandia Litigation Group Newsletter.

Sanders Viener Grossman is uniquely situated to benefit the PSC because of its vast Avandia work under Mr. Grossman who served on the PSC. Specifically, Mr. Grossman and the

Sanders Firm attorneys and staff served on the Discovery and Sales and Marketing teams, developed over twenty bellwether cases, conducted more than 65 depositions, drafted pleadings and memos on Consumer Refund and TPP Class Actions, lead Third Party Discovery and document review, and also argued Discovery-related issues and motions before the Court and Special Master.

The Sanders Firm currently has Pelvic Mesh cases pending in the State Court of New Jersey coordinated proceedings before the Honorable Carol Higbee. The Sanders Firm is also reviewing numerous TVM inquiries and expects to be filing a large number of complaints in the coming months. Ms. Maniatis and several other attorneys and staff at Sanders Viener Grossman already devote a significant part of their practice to developing Pelvic Mesh cases and Vicki looks forward to continuing dedicate a substantial amount of her time and services on behalf of plaintiffs generally, and her firm supports her in this effort.

In further support of this application, Ms. Maniatis has reviewed the Proposed Counsel Structure Plan for MDLs 2325, 2326 and 2327 filed in this Court on March 19, 2012 and she joins in the recommendation to the Court that the plan be adopted. Ms. Maniatis's firm filed *Illuminata Baez v. Ethicon, Inc.*, 3:12-cv-01815 currently awaiting Tag-along transfer to this Court.

Ms. Maniatis looks forward to the opportunity to perform Common Benefit work on behalf of plaintiffs based upon the rates and conditions the Court deems appropriate and respectfully requests appointment to the PSC by this Honorable Court.

Respectfully submitted,

**Sanders Viener Grossman, LLP**

By: /s/ Victoria J. Maniatis

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